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Attorney for Jacob Lill

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB LILL,

Defendant.

CASE NO: 2:11-cr-00310-JCM-CWH

**UNOPPOSED MOTION TO CONDUCT A
PRE-PLEA PRESENTENCE
INVESTIGATION REPORT AND
PROPOSED ORDER**

COMES NOW, defendant, JACOB LILL, by and through his counsel, JAMES A. ORONoz, ESQ., and hereby moves this Court for an Order granting the instant motion for a Pre-Plea Presentence Investigation Report ("Pre-Plea PSR") to be prepared by the United States Department of Parole and Probation.

1. It is counsel's understanding that Mr. Lill does not have any prior convictions that would disqualify him from eligibility under the Safety Valve Provision, listed at U.S.S.G. § 5C1.2(a)(1). However, counsel cannot accurately make this assessment or calculate Mr. Lill's criminal history score without the information that would be provided in a Pre-Plea PSR. Mr. Lill's Criminal History category will drastically impact his sentencing exposure, negotiations, and his decision as to how he should proceed in this matter. A Pre-Plea PSR will promote judicial economy and aid in the manner in which this case is timely resolved.

2. Therefore, undersigned counsel respectfully requests this Court issue an Order directing the United States Department of Parole & Probation to conduct a Pre-Plea Presentence Investigation Report as soon as possible.

3. Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney James Keller, regarding this request and he has no opposition.

DATED this 22nd day of July, 2013.

/s/ James A. Oronoz
JAMES A. ORONoz, Esq.
700 South 3rd Street
Las Vegas, NV 89101
Counsel for JACOB LILL

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB LILL,

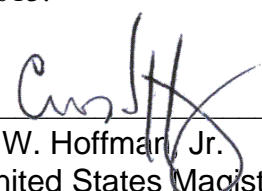
Defendant.

CASE NO: 2:11-cr-00310-JCM-CWH

ORDER

IT IS HEREBY ORDERED that that the United States Department of Parole and Probation will prepare a Pre-Plea Presentence Investigation Report on Defendant JACOB LILL.

DATED this 23rd day of July, 2013.



C.W. Hoffman, Jr.
United States Magistrate Judge

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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of Oronoz & Ericsson L.L.C. and is a person of such age and discretion as to be competent to serve papers.

That on July 22, 2013, I served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to the person(s) named below:

DANIEL G. BOGDEN
United States Attorney
333 Las Vegas Blvd. South, #5000
Las Vegas, NV 89101
Counsel for United States

JAMES E. KELLER
Assistant United States Attorney
100 West Liberty
Reno, NV 89501
Counsel for United States

/s/ Lucas Gaffney, Esq.
Employee of the Oronoz Law Offices